

**OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF DRINKING AND GROUND WATERS
FY2011 DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)
State Fiscal Year 2011 (July 1, 2010 to September 30, 2011)**

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Not all State Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Resource shortfalls have occurred as the regulations, mandated by the Safe Drinking Water Act (SDWA), come into effect.

Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the SDWA is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

To that end, Region 5, in cooperation with our State program partners, has developed a program plan that includes all of the major activities required by primacy regulations and primary drinking water regulations, to guide annual workplan and/or EnPPA discussions leading to annual grant commitments and work-sharing agreements. We recognize that new initiatives that are not included in this plan, such as the activities generated by the American Recovery and Reinvestment Act (ARRA) of 2009, will require significant state resources to implement and should also have considerable benefits to promote compliance at public water systems (PWSs).

The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. For instance, in a state where radionuclides are prevalent, the state may need to devote proportionately more resources to implementing that regulation than another state, where arsenic is more prevalent.

Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority-setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of State programs are listed in the table. Priority activities are flagged throughout the ARDP (denoted with a triangle ►), which will be tracked more than once per year.

The State and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the State and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both State and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.

- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM
CORE STATE ACTIVITIES

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent State decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

¹ States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

Acronyms/Abbreviations

ACS – Annual Commitment System
ARDP – Annual Resource Deployment Plan
As – Arsenic
CCR – Consumer Confidence Report
CFR – Code of Federal Regulations
CPE – Comprehensive Performance Evaluation
CTA – Comprehensive Technical Assistance
CWA – Clean Water Act
CWS – Community Water System
DBP – Disinfection By-Products
D/DBPR – Disinfectants and Disinfection By-Products Rule
DWA – Drinking Water Academy
DWSRF – Drinking Water State Revolving Fund
eDV – Electronic Data Verification (Tool)
EnPPA – Environmental Performance Partnership Agreement
ERG – Expense Reimbursement Grant
ERP – Enforcement Response Policy
ESS – electronic sanitary survey
ETT – ERP Enforcement Targeting Tool
FBRR – Filter Backwash Recycling Rule
GWR – Ground Water Rule
GWS – Ground Water System
GUDI – Ground Water under the Direct Influence of Surface Water
HAA5 – Haloacetic Acids
HSA – Hydrogeologic Sensitivity Assessment
IDSE – Individual Distribution System Evaluation
IESWTR – Interim Enhanced Surface Water Treatment Rule
IOC – Inorganic Contaminant
IUP – Intended Use Plan
LCR – Lead and Copper Rule
LCRMR – Lead and Copper Rule Minor Revisions
LCRSTR – Lead and Copper Rule Short-term Revisions
LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule
LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule
MCL – Maximum Contaminant Level
M/R – Monitoring/Reporting
MRDL – Maximum Residual Disinfectant Level
NCWS – Non-Community Water System
NPDWR – National Primary Drinking Water Regulation
NTNCWS – Non-Transient Non-Community Water System
OCCT – Optimal Corrosion Control Treatment
pCi/L – picoCurie per liter
PN – Public Notification
ppb – part per billion
PWS – Public Water System
PWSID – Public Water System Identification
PWSS – Public Water System Supervision

Rads – Radionuclides
RTC – Returned to Compliance
SDWA – Safe Drinking Water Act
SDWIS/FED – Safe Drinking Water Information System/Federal
SDWIS/State – Safe Drinking Water Information System/State
SNCs – Significant Non-Compliers
SOC – Synthetic Organic Contaminant
SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation
SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager
Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule
SWAP – Source Water Assessment Program
SWP – Source Water Protection
SWTR – Surface Water Treatment Rule
TCR – Total Coliform Rule
TMDL – Total Maximum Daily Load
TT – Treatment Technique
TTHM – Total Trihalomethanes
UCMR – Unregulated Contaminant Monitoring Rule
V&E – Variances and Exemptions
VOC – Volatile Organic Contaminant
WBDO – Waterborne Disease Outbreak
WQP – Water Quality Parameter

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Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.1 – Adopt all rules in a timely manner (within two year extension period).</p> <p>Click here to go back to the table of contents.</p>	<p>Ohio EPA will continue drafting the federal rule into state rule language and developing guidance for PWSs and state to implement the new rule once it is effective in Ohio.</p>	<p>Provide comments on draft rules, as requested.</p> <p>Respond to questions from our state programs about surface water treatment regulations.</p> <p>Train state staff about surface water treatment regulations by offering in-state and/or regional training opportunities.</p> <p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>Per agreement with Ohio EPA, the LT2 implementation agreement is modified as follows: R5 has committed to track compliance for LT2 Schedule 3 PWSs through the completion of monitoring, and the mailing of bin designation letters for all Schedule 3 systems (except Buckeye-Wellsville, which will be handled by Ohio EPA).</p>	<p>Ohio EOY: Ohio EPA adopted the LT2SWTR on January 8, 2010. A draft primacy package was submitted to Region 5 on May 6, 2009. Still awaiting AG certification to complete primacy application.</p> <p>R5 EOY: R5 appreciates the assistance provided by Ohio EPA staff on PWS-specific issues. Between July 1, 2010, and June 30, 2011, R5 completed the following early implementation activities for LT2 Schedule 3 systems: July 2010: R5 sent bin designation letters to 38 systems; August 2010: R5 sent bin designation letters to 3 systems; and November 2010: R5 sent bin designation letters to 1 system. Judy Stottsberry was indispensable in this effort by following up with PWS operators as needed and making sure that every Schedule 3 system submitted a bin calculation form to R5. Ohio has since taken over responsibility for LT2 implementation.</p> <p>R5 plans to send remaining comments on LT1 to the state soon; Ohio is awaiting attorney general certification of two LT1 provisions (OAC 3745-81-72 and 3745-81-73).</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
		<p>R5 is actively tracking compliance for LT2 Schedule 3 and keeping Ohio EPA updated on system compliance status as needed.</p> <p>R5 plans to have completed reviews of the final primacy applications by FY2010 for the following rules: LCRSTR, LCRMR, revised PN/TCR, radionuclides, FBRR/LT1, and APA.</p> <ul style="list-style-type: none"> ▶ R5 will track primacy submittal/review for all rules, including LT2 and FBRR. ▶ R5 will determine whether primacy application is complete, identify rule indicators, and determine tracking required for new rules by state. ▶ R5 will track early implementation transition activities including violation follow-up. ▶ R5 will conduct LT2 enforcement for R5 implementation in Ohio and upon request from the state. 	
<p>1.2 – Notify all surface water and GUDI systems of their regulatory requirements.</p> <p><i>Listed below is a broad summary of</i></p>	<p>Ohio EPA will notify surface water systems of existing requirements.</p> <p>Ohio EPA will complete activities for schedule 3 and 4 PWSs</p>	<p>Promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.</p>	<p>Ohio EOY: With the exception of three Schedule 4 systems, all surface water systems have completed monitoring and have been placed into a bin. Of the systems that have</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p><i>LT2ESWTR requirements.</i> <i>For complete requirements, see 40 CFR Part 141, Subpart W.</i> Systems must conduct an initial and a second round of source water monitoring for each plant that treats a surface water or GUDI source, to determine what level, if any, of additional <i>Cryptosporidium</i> treatment they must provide.</p> <p>NOTE: There are four schedules depending on system size with the first round of monitoring beginning 10/06, 4/07, 4/08, and 10/08, for Schedules 1-4 respectively. Treatment is based on first round of monitoring with initial monitoring schedules of 4/12 for Sch 1, 10/12 for Sch 2, 10/13 for Sch 3, and 10/14 for Sch 4.</p> <p>Systems that plan to make a significant change to their disinfection practice must develop disinfection profiles and calculate disinfection benchmarks.</p> <p>Filtered water systems must determine their <i>Cryptosporidium</i> treatment bin classification, and provide additional treatment, if required, and unfiltered systems must provide treatment.</p> <p>Systems with uncovered finished water storage must comply with the requirements to cover the facility or treat the discharge from the facility.</p> <p>Systems required to provide additional treatment for <i>Cryptosporidium</i> must</p>	<p>consistent with the Region 5 – All States LT2ESWTR Early Implementation Table for schedule 1 and 2 PWSs.</p>	<p>R5 has notified all LT2 Schedule 1 and 2 PWSs of their bin designations.</p>	<p>completed the first round of monitoring, nine water systems are required to provide additional <i>Cryptosporidium</i> treatment. We are actively working with all nine water systems to help them with a plan for providing the necessary treatment by their respective treatment deadlines.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>implement microbial toolbox options.</p> <p>Systems must address significant deficiencies identified in sanitary surveys. Systems must respond within 45 days of being notified of a significant deficiency, indicating how and on what schedule they will address the significant deficiency.</p> <p>Systems must electronically report all Schedules 1, 2 and 3 early implementation activities to EPA’s Data Collection and Tracking System (DCTS).</p> <p>Is there anything that Ohio EPA can do to begin tracking how many systems either have met or are meeting the requirement that systems notify the state in writing within 45 days that IESWTR deficiencies identified in the sanitary surveys are corrected?</p> <p>Source: April 2009 draft logic model report, p. 18 (S5).</p>	<p>Ohio EPA will not commit to begin tracking how many systems either have met or are meeting the requirement that systems notify the state in writing within 45 days that IESWTR deficiencies identified in the sanitary surveys are corrected.</p>		<p><i>R5 EOY: Is the activity in the “state commitment” column related to “...investigating the use of ESS and SDWIS to track how many systems either have met or are meeting the requirement that systems notify the state in writing within 45 days that IESWTR deficiencies identified in the sanitary surveys are corrected” still applicable? If so, what is the status of this activity?</i></p> <p><i>Ohio EOY: No. Ohio does not have an electronic way to track responses to surveys, but we will apply this to all systems not just surface water systems.</i></p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules. <i>NOTE: The next update for SDWIS/State will contain compliance modules for Stage 2 and LT-2 rules.</i>	Ohio EPA has drafted a rule which would require certified laboratories to report data electronically and submit lead and copper data on individual sample reports beginning July 1, 2010. Ohio EPA will not begin using the Compliance Decision Support System (CDS) to assist with compliance determination until sometime after July 1, 2010.	Region 5 will complete enforcement actions for those PWSs which the region initiated an action and has provided copies of all sampling plans and all monitoring data (i.e. crypto, <i>e. Coli</i> , turbidity) to Ohio EPA.	Ohio EOY: Ohio EPA maintains inventory data and all SWTR violations in SDWIS. Surface water compliance data is submitted electronically for some systems. <i>Ohio is using CDS set-up to assist with compliance determination for lead and copper monitoring and action level exceedances.</i> <i>R5 EOY: What is the status of the activity related to using CDS to assist with compliance determinations after July 2010 (see “state commitment” column)?</i> <i>Ohio EOY: See above. However, should it be in SWTR? [This information has been copied into row 5.4 in the LCR section.]</i>
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.	Monitor surface water treatment regulation related to State follow-up to the findings of the last data and enforcement verification report. ► R5 will evaluate extent to which LT2 violations are reported to SDWIS/FED and track actions taken on violations. As of June 30, 2010, there were no LT2 violations in SDWIS/FED for Ohio EPA. ¹	Ohio EOY: Ohio EPA reports quarterly to USEPA all violations. R5 EOY: Ohio EPA is reporting LT2 treatment technique (TT) violations. As of October 2011, there were nine LT2 TT violations in SDWIS/Fed. (As of October 2010, there had been none.)

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.	Ohio EPA will conduct sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems.	Provide training, as requested. ► R5 will measure completeness of sanitary surveys within evaluation time period (three or five years). As of April 2010, Ohio EPA community surface water system completeness was 96.2% for 2007-2009, and 66.7% for 2008-2010. ²	Ohio EOY: Ohio EPA conducted SW surveys. R5 EOY: Ohio EPA did not meet the FY2011 commitment of 97 percent of surface water sanitary surveys complete with 96.3 percent (282 out of 293) of the sanitary surveys at community water systems (CWSs) completed between calendar year (CY) 2008 and CY 2010. The FY2010 commitment had been 94.6 percent. Source: SDW-1a. (This query also includes specific systems for which the survey has not been reported to SDWIS/FED if Ohio is interested in this information.)
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at alternate location approved by the State.	Systems were required to submit written notification of whether they recycle their filter backwash by December 8, 2003. As a result of the notifications, Ohio EPA determined that none of its systems are subject to the FBRR.		Ohio EOY: All of the systems that recycle, recycle to the appropriate location.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Recycled backwash water practices are evaluated by staff during sanitary surveys. If a system is not in compliance with the FBRR an NOV will be sent.		Ohio EOY: Questions are asked as part of the sanitary survey. In order to add detail, Ohio EPA will begin asking PWSs to use the USEPA recordkeeping form from the guidance manual and will train staff on reviewing the form.
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Ohio EPA will review the monthly operation reports (MORs) submitted by PWSs using surface water to ensure filtration/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources monthly.		Ohio EOY: Surface water MORs are reviewed, either in hard copy or through electronic submittal. When violations are found on the MORs, violations are generated.
1.9 – Follow-up on turbidity TT violations.	Ohio EPA sends NOVs for turbidity violations and requests public notice. Tracks the receipt of public notices. SWTR SNCs are addressed.	Region 5 will assist as necessary, or as requested.	Ohio EOY: MORs are reviewed. NOVs are sent for TT violations.
1.10 – Follow-up on individual filter turbidity M/R violations. a. Track individual filter turbidity trigger exceedances. b. Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.	Ohio EPA sends NOVs for M/R violations and requests public notice. Tracks the receipt of public notices. PWSs submit MORs that record filter triggers and require profiles to be submitted when triggered.	Region 5 will assist as necessary, or as requested.	Ohio EOY: District Offices reviewed the MORs and responded to any filter exceedances.
1.11 – When required, track the completion of CPE/CTA for PWSs where the cause/solution of turbidity problems is unclear.	When triggered, CPE requirements are to be reported on the MORs.		Ohio EOY: Systems are required to submit results of any triggered CPE.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.12 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	MORs require submission of residual disinfectant concentration results. MORs are reviewed in the District Offices. NOV's are sent for monitoring violations and when residuals do not meet appropriate ranges.		Ohio EOY: Surface water MORs are reviewed. Violations are issued if disinfection requirements are not met.
1.13 – Follow-up on disinfection residual TT violations.	Ohio EPA sends NOV's and requests public notice for violations. Tracks the receipt of public notices.	Region 5 will assist as necessary, or as requested	Ohio EOY: NOV's sent and PN requested.
1.14 – Follow up on disinfection residual M/R violations.	Ohio EPA sends NOV's and requests public notice for violations. Tracks the receipt of public notices.	Region 5 will assist as necessary, or as requested	Ohio EOY: NOV's sent and PN requested.
1.15 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	Treatment data is reported quarterly to SDWIS/FED.		Ohio EOY: Treatment data is maintained in SDWIS and reported to USEPA quarterly.
1.16 – Ensure that disinfection profiling and benchmarking is conducted when required by rule.	This is reviewed during sanitary surveys to ensure compliance with federal requirements.		Ohio EOY: Reviewed during sanitary surveys and when a change in disinfection is proposed.
1.17 – Ensure that all required records are kept by surface water systems.	Yes.		Ohio EOY: Records were checked during sanitary surveys.
1.18 – Complete remaining GUDI determinations.	GWR effective 10/30/10 (primacy deadline was 11/10/10). Definitions were clarified at this time.		Ohio EOY: GUDI designations are complete. The GWR has been adopted and clarifies the difference between GUDI and GWR. As circumstances change a specific PWS designation, Ohio EPA will issue a designation, if necessary.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.19 – When required, track the completion of CPE/CTA for PWSs where the causes/solutions of turbidity problems are clear.	Yes.		Ohio EOY: Systems are required to submit results of any triggered CPE.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rule			
<p>2.1 – Notify all public water systems of their regulatory requirements.</p> <p>Click here to go back to the table of contents.</p>	PWSs are notified of their monitoring requirements.	R5 plans to have completed reviews of the final primacy applications by FY2010 for the following rules: LCRSTR, LCRMR, revised PN/TCR, radionuclides, FBRR/LT1, and APA.	<p>Ohio EOY: Issued monitoring schedules to PWSs. Sent reminder post cards before the end of the monitoring period for systems monitoring quarterly.</p> <p>R5 EOY: Ohio EPA submitted to R5 a final primacy revision package for TCR/PN revisions on April 20, 2009. R5 submitted remaining comments to Ohio EPA on October 31, 2011.</p>
<p>2.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.</p> <p>For bacteria sampling for GWSs with minimal treatment and less than 1,000 population, ensure the Ohio EPA data system is programmed to accurately track compliance with TCR MCL violation calculations <u>and</u> GWR corrective action requirements in accordance with the “standard operating procedures for GWR schedules and courtesy letters” flow chart.</p>	Yes.		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for TCR. Will upgrade to SDWIS 3.1 in late Fall 2011.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rule			
2.3 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.	Monitor TCR related State follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: Sent reminder post cards to PWSs and laboratories that monitor quarterly in order to get results in before determining violations. Incorporated automated reminder calls for systems monitoring quarterly in SFY2011. R5 EOY: As of October 2011, the CY2009 to CY2010 TCR late reporting query indicates that 87 percent of TCR violations (2009 total: 1,240) were reported on time in 2009, and 93 percent of TCR violations (2010 total: 1,222) were reported on time in 2010.
2.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ohio EPA sends NOVs and requests public notice for violations. Tracks the receipt of public notices. Ohio EPA is working on a standard operating procedure for addressing PWSs with positive samples in order to find and eliminate causes of contamination. Ongoing TCR MCLs are a priority for Ohio. Tier 1 public notices are posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html .	Region 5 will assist as necessary, or as requested.	Ohio EOY: District Office Compliance Coordinators and the Ground Water Rule Group developed procedures for addressing total coliform positive samples and MCLs. NOVs were sent to MCLs and requested PN. Addressed MCL SNCs.
2.5 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.	Ohio EPA will ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.		Ohio EOY: Ohio EPA conducted sanitary surveys as frequently as required by rule.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rule			
2.6 – Follow-up on all M/R violations.	<p>FY10 ARDP: Ohio EPA sends NOVs and requests public notice for violations. Track the receipt of public notices. Enforcing against SNCs. Using SDWIS data to target compliance assistance activities to non-compliant PWSs. Send reminder post cards prior to the end of the monitoring period to reduce monitoring violations. Some districts call and remind systems to monitor.</p> <p>Issuing conditioned licenses to address the worst M/R violators.</p>	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent M/R NOVs and requested PN. Used phone calls, reminder post cards and listserves to reduce M/R violations. Addressed systems with a score over 11 on the ETT list.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
<p>3.1 – Adopt the GWR in a timely manner (within two year extension period).</p> <p>Click here to go back to the table of contents.</p>	Ohio EPA adopted the GWR on October 31, 2010.	<p>Respond to questions from our state programs about the GWR.</p> <p>As requested, train state staff about GWR by offering in-state and/or regional training opportunities.</p> <p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>Ohio EPA has not adopted the GWR, but will inform GWSs of</p>	<p>Ohio EOY: Submitted all but AG certification for primacy 11/30/10 and still waiting for AG certification.</p> <p>Monitoring requirements were effective December 1, 2009.</p> <p>R5 EOY: R5 will begin reviewing the final GWR primacy package in FY2012 to identify issues raised during R5's review of the draft GWR primacy package to understand how these issues are being addressed. However, R5 will not request an attorney to review the</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
		<p>federal regulatory requirements, track GWS compliance with these requirements, report violations to SDWIS/Fed, and refer violating GWSs to U.S. EPA Region 5 for enforcement until state rule adoption takes place. Source: FY09 EOY.</p> <p>► R5 will track primacy submittal/review for all rules, including GWR.</p> <p>► R5 will determine whether primacy application is complete, identify rule indicators, and determine tracking required for new rules by state.</p>	final GWR primacy package until Ohio receives AG certification.
3.2 – Notify all public water systems of their regulatory requirements.	Yes, when appropriate.	As requested by Ohio EPA, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	Ohio EOY: Sent letters and made phone calls to systems to remind them of requirements for GWR when PWSs are triggered into GWR monitoring.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	<p>States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.</p> <p>Ohio EPA will review enhancements the state made to track and report GWR violations to determine if operating as intended by the state program and per Data Entry Instructions.</p>	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	<p>Ohio EOY: OEPA is currently using SDWIS 2.22, but will upgrade to 3.1 as soon as ESS software upgrade is available in Fall 2011. OEPA is tracking inventory and creating GWR violations in SDWIS 2.22, but it will be easier to manage with SDWIS 3.1.</p> <p>R5 EOY: Ohio EPA is currently using SDWIS/State 2.22 and has been waiting for the ESS software update prior to moving to SDWIS/State 3.0. The ESS software upgrade became available in November 2011 and Ohio EPA is currently beginning the process to move to SDWIS/State 3.01. Ohio EPA is planning to have the SDWIS/State 3.01 software up and running by the end of March 2012.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
<p>3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems. State will begin reporting as soon as possible after release of Data Entry Instructions.</p> <p>The 2008 program review documented that some systems determined to be GWUDI have installed filtration, but most have not. Ohio EPA asked these systems to submit additional documentation on GWUDI status, but information had not yet been provided. Ohio EPA plans to use the GWR to address these systems or will obtain additional information on these systems when the GWR is effective (12/1/09). Source: FY09 EOY.</p>	<p>As resources allow Ohio EPA will electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.</p> <p>Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.</p> <p>Ohio EPA will work with U.S. EPA to develop a process to track and report violations of the GWR to U.S. EPA.</p> <p>U.S. EPA needs to have its data management system available by the July-September 2010 quarter when the majority of systems would be triggered into source water monitoring.</p>	<p>Region will provide State with new rule (GWR) violation codes when established by HQ.</p> <p>► R5 will evaluate extent to which GWR violations are reported to SDWIS/FED and track actions taken on violations after Data Entry Instructions are made final.¹</p>	<p>Ohio EOY: GWR violations were reported.</p> <p>R5 EOY: As of October 2011, Ohio EPA has reported 126 GWR M/R violations to SDWIS/Fed. (As of October 2010, there were 34 GWR M/R violations in SDWIS/Fed.)</p> <p>Ohio EPA has been able to track but report only a portion of their GWR violations to SDWIS/Fed as their current version of FedRep will not report many of the GWR violations. In order to report all GWR violations, Ohio EPA needs to move to SDWIS/State 3.0/3.01 so they may use FedRep 3.3 to report GWR violations.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
<p>3.5 – Conduct sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter.</p> <p>Report sanitary surveys when final data entry instructions are available.</p>	Yes, when appropriate.	► R5 will measure completeness of sanitary surveys within evaluation time period (three or five years).	R5 EOY: As of April 2011, 93 percent of the ground water CWSs, about 96 percent of ground water NTNCWSs, and about 96 percent of ground water TNCWSs have completed sanitary surveys. This will be measured in July 2013 for CWSs surveys completed between 12/1/2009-12/31/2012, in 2014 for NCWSs surveys completed between 12/1/2009-12/31/2014, and then every year after that (with rolling three-year periods).
<p>3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.</p> <p>R5 information request: What is the number of GWSs that will be subject to treatment compliance monitoring in lieu of triggered source water monitoring? Source: FY09 EOY.</p>	Yes, when appropriate.		Ohio EOY: No systems were triggered into 4-log removal. Eleven systems requested 4-log demonstration to avoid triggered source water monitoring.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	Yes, when appropriate.	Before state rule adoption, Ohio EPA will indicate to Region 5 which GWSs violated a corrective action timeframe as soon as possible but no later than 60 days after discovery.	Ohio EOY: For PWS that detect E. coli in triggered source water samples, Ohio EPA will complete a hydrogeologic sensitivity assessment (HSA). If the results of the HSA and evaluation of existing water quality data are not definitive, additional sampling (assessment source water sampling) will be required to help identify appropriate corrective actions. Ohio EPA developed guidance for source significant deficiencies and will develop guidance for the other areas. Until guidance is developed the significant deficiencies will be determined on a case-by-case basis.
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	Yes, Ohio EPA will track TT violations for the GWR.		Ohio EOY: Ohio EPA issued NOV's for GWR violations.
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ohio EPA will not be requiring optional source water monitoring.		Ohio EOY: Ohio did not allow optional source water monitoring.
3.10 – Follow-up on corrective action consultation and reporting violations.	Yes, when appropriate.	► Until state adoption, enforcement of corrective action requirements will be conducted by Region 5 in close consultation with Ohio EPA. Region 5 will be reliant on 60-day referral correspondence during this period.	Ohio EOY: Corrective action letters are sent by the District Offices and the District tracks compliance.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.11 – Follow-up on M/R violations.	Yes, when appropriate.	► Until state adoption, enforcement of monitoring requirements will be conducted by Region 5 in close consultation with Ohio EPA. Region 5 will be reliant on 60-day referral correspondence during this period.	Ohio EOY: Ohio had 140 Type 34 violations between 7/1/2010 and 9/30/2011. NOVs were sent and requested PN.
3.12 – Follow-up on public notification violations.	No. Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.	► Until state adoption, enforcement of public notification requirements will be conducted by Region 5 in close consultation with Ohio EPA. Region 5 will be reliant on timely submittals to SDWIS/FED or 60-day referral correspondence during this period. Source: FY10 ARDP.	<i>R5 EOY: What is the status of activity 3.12 regarding following up on PN violations?</i> <i>Ohio EOY: Ohio is working with the district offices to ensure consistent implementation of Tier 1 PN violations. Ohio will not expand the PN violation program until full implementation of the Tier 1 program is complete.</i>
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ohio EPA will not commit to follow-up on other discovered recordkeeping/reporting violations prior to state adoption of rules.	► Until state adoption, enforcement of other discovered recordkeeping requirements will be conducted by Region 5 in close consultation with Ohio EPA. Region 5 will be reliant on timely submittals to SDWIS/FED or 60-day referral correspondence during this period. Source: FY10 ARDP.	<i>R5 EOY: What is the status of activity 3.13 regarding following up on recordkeeping and reporting violations?</i> <i>Ohio EOY: Ohio is working with the district offices to ensure consistent implementation of Tier 1 PN violations. Ohio will not expand the PN violation program until full implementation of the Tier 1 program is complete.</i>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.1 – Notify all public water systems of their regulatory requirements. Click here to go back to the table of contents.	Ohio will send monitoring schedules to all PWS for CY 2011 in late 2010.		Ohio EOY: Sent monitoring schedules to all PWSs.
4.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.	Yes.		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for Nitrate and Nitrite. Will upgrade to SDWIS 3.1 in late Fall 2011.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.	Monitor State nitrate/nitrite related follow-up to the findings of the last data and enforcement verification report.	<p>Ohio EOY: OEPA electronically reported all MCL and M/R violations.</p> <p>R5 EOY: As of October 2011, the CY2009 to CY2010 nitrate late reporting query shows that all M/R violations were reported either on time or one quarter late. Specifically, in CY2009, none of the 160 M/R violations were reported on time. In CY2010, 102 of 116 (88 percent) nitrate M/R violations were reported on time, and 14 (12 percent) were reported one quarter late. EPA expects data the quarter following the compliance period end date, not the quarter following the state's compliance determination. The possible reasons for the late reporting in CY2009 were discussed during the January 2011 semi-annual call (e.g., unclear guidance related to how "on-time" reporting is defined, early quarterly submissions, and lack of resources in the district offices).</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Nitrate MCL violators are priority systems for follow-up enforcement activities. MCLs are posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html .	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent MCL NOV and request PN. Track receipt of PN. Addressed MCL violations.
4.5 – Follow-up on M/R violations that occur at schools or day cares. Explain how schools and day cares M/R violators will be identified and tracked.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA is using SDWIS to target compliance assistance and enforcement activities in areas with compliance problems. Send reminder post cards prior to the end of the monitoring period to reduce monitoring violations. Some districts remind systems to monitor with phone calls.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Made automated calls and sent reminder post cards to PWSs. Sent NOV and requested PN for monitoring violations.
4.6 – Follow-up on M/R violations for systems that had levels ≥ 50 % MCL in last 3 years. Explain how systems that had levels at or above 50% MCL, including transient systems, will be identified and tracked.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA is using SDWIS to target compliance assistance and enforcement activities in areas with compliance problems. Send reminder post cards prior to the end of the monitoring period to reduce monitoring violations.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Made automated calls and sent reminder post cards to PWSs. Sent NOV and requested PN for monitoring violations.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.7 – Follow-up on all other M/R violations.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Send reminder post cards prior to the end of the monitoring period to reduce monitoring violations.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Made automated calls and sent reminder post cards to PWSs. Sent NOV and requested PN for monitoring violations.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
<p>5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).</p> <p>Click here to go back to the table of contents.</p>	Ohio adopted LCR minor revisions on July 24, 2009.	<p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>Provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012).</p> <p>R5 plans to have completed reviews of the final primacy applications by FY2010 for the following rules: LCRSTR, LCRMR, revised PN/TCR, radionuclides, FBRR/LT1, and APA. Source: FY09 EOY.</p> <p>► R5 will track primacy submittal/review for all rules, including LCRSTR.</p> <p>► R5 will determine whether primacy application is complete, identify rule indicators, and determine tracking required for new rules by state.</p>	<p>R5 EOY: During FY 2011, Ohio gathered and submitted lead/copper and water quality parameter data to EPA's Lead and Copper Rule Workgroup, which will enable the workgroup to evaluate more targeted system monitoring based on risk and will result in cost savings by eliminating unnecessary monitoring, compliance tracking, and data entry.</p> <p>Ohio EPA submitted to R5 final primacy revision packages for LCR minor revisions (LCRMR) on October 1, 2007, and LCR short-term revisions (LCRSTR) on September 28, 2009. R5 has completed reviewing the LCRMR and is processing that rule with a few others (APA and Radionuclides) for Regional Administrator approval. R5 is close to completing review of LCRSTR. R5 sent remaining comments to Ohio on LCRSTR on August 24, 2011.</p> <p>As of October 2011, Ohio had reported to SDWIS/Fed 291 LCRSTR consumer notification M/R violations for active systems.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	Ohio EPA is revising its compliance programs to address most of the revisions and use SDWIS to track compliance.		Ohio EOY: Revised program to include revisions of LCRSTR and track through SDWIS. R5 EOY: Recently, LCR monitoring and reporting oversight was centralized (source: 2012 ARDP).
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Ohio EPA will send monitoring schedules to all PWSs for calendar year 2011 in late 2010.		Ohio EOY: Sent monitoring schedules to all PWSs. Notified systems of the requirement to do Consumer Notice. R5 EOY: Ohio EPA is commended for requiring systems to sample during the following June to September when the systems fail to collect lead and copper reduced triennial samples during June to September of the year Ohio EPA scheduled the systems to sample.
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Yes. Ohio is using compliance schedules in SDWIS to track action level exceedances.		Ohio EOY: OEPA will continue to use SDWIS to track violation and ALE milestone activities. Ohio is using CDS set-up to assist with compliance determination for lead and copper monitoring and action level exceedances. R5 EOY: Ohio EPA will investigate options to automate the return to compliance for LCR M/R violation (source: 2012 ARDP).

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 th percentile action level sample data for all large and medium sized systems, and 90 th percentile action level exceedance sample data for small systems.	<p>Yes.</p> <p>Ohio EPA is using SDWIS to generate M/R violations more accurately and developing Compliance Schedules in SDWIS to accurately track and report TT violations.</p> <p>Ohio EPA commits to continue inputting LCR milestone data to SDWIS.</p>	<p>Monitor State LCR related follow-up to the findings of the last data and enforcement verification report.</p> <p>► R5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED and track actions taken on violations. As of April 2010, there were no LCRSTR violations in SDWIS/FED for Ohio EPA.²</p> <p>► R5 will evaluate completeness of reporting LCR 90th percentile action level sample data. As of April 2010, Ohio's 90th percentile lead action level sample data in SDWIS/Fed is 74.5 percent for the 2008-2010 CY time period.³</p>	<p>R5 EOY: The reporting completeness of 90th percentile action level sample data is a headquarters-reported triennial measure for samples taken in calendar years 2008, 2009, and 2010. As of October 2011, about 98 percent of the reported sample data were complete for CWSs, and 100 percent were complete for NTNCWSs. (The query used to obtain this information includes specific systems if Ohio is interested.)</p>
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required CWSs.	<p>Ohio EPA reviews and approves OCCT. Ohio EPA will continue to implement SDWIS to track lead and copper milestones. Violations will be issued, as necessary.</p> <p>Ohio is using compliance schedules in SDWIS to track OCCT submission and implementation. The district office (DO) reviews and approves the OCCT.</p>		<p>Ohio EOY: Ohio reviews/approves OCCT. Tracks submission in SDWIS. Deems/Dones tracked in SDWIS. Violations issued as necessary.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.7 – Designate OCCT and follow-up on OCCT violations at all NTNCWSs that likely serve water to sensitive subpopulations (i.e., schools, daycares). Explain how school and day care M/R violators will be identified and tracked.	<p>Ohio EPA reviews and approves OCCT. Ohio EPA will continue to implement SDWIS to track lead and copper milestones. Violations will be issued, as necessary.</p> <p>Ohio is using compliance schedules in SDWIS to track OCCT submission and implementation. The DO reviews and approves the OCCT.</p>		Ohio EOY: Ohio reviews/approves OCCT. Tracks submission in SDWIS. Deems/Dones tracked in SDWIS. Violations issued as necessary.
5.8 – Follow-up on ERP M/R violations when lead was detected > 5 ppb at 90 th percentile in the last round of initial tap sampling conducted. Explain how these systems will be identified and tracked.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA addresses M/R SNCs.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio addresses M/R violations for systems on the ETT list.
5.9 – Follow-up on all ERP M/R violations.	<p>Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA addresses M/R SNCs.</p> <p>Ohio EPA will investigate options to automate the return to compliance for LCR M/R violation.</p>	Region 5 will assist as necessary, or as requested.	<p>Ohio EOY: Ohio addresses M/R violations for systems on the ETT list.</p> <p><i>R5 EOY: What is the status of the auto-SOX feature mentioned in the “state commitment” column?</i></p> <p><i>Ohio EOY: There currently is not an auto SOX for lead and copper, but DDAGW is routinely checking to SOX all violations. In addition, Ohio is rescheduling triennial systems to monitor in the next monitoring period to bring them back into compliance.</i></p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.10 – Follow-up on M/R violations when lead was detected > 5 ppb at 90 th percentile in last round of reduced sampling conducted. Explain how these systems will be identified and tracked.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA addresses M/R SNCs.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio addresses M/R violations for systems on the ETT list.
5.11 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.	Ohio uses compliance schedules in SDWIS to track CC requirements. When triggered, PWS are required to optimize corrosion control. Ohio is using compliance schedules in SDWIS to track OCCT submission and implementation. The district office staff review and approve the OCCT.		Ohio EOY: Ohio reviews and approves OCCT. Tracks submission in SDWIS.
5.12 – Set water quality parameter ranges for all CWSs and NTNCWSs that are required to optimize corrosion control.	Ohio uses compliance schedules in SDWIS to track CC requirements. When triggered, PWS are required to optimize corrosion control and Ohio sets water quality parameters. Ohio is using compliance schedules in SDWIS to track water quality parameter submission. The district office staff review and establish the water quality parameter ranges.	R5 or headquarters to provide training to states on setting appropriate optimal water quality parameter (OWQP) ranges. As of July 2010, a work assignment is being prepared by EPA headquarters for the development of training materials.	Ohio EOY: Water quality parameters are set as required. Ohio tracks MOR submissions. R5 EOY: Headquarters provided training to R5 states on setting appropriate optimal water quality parameter (OWQP) ranges at the R5 office in July 2011.
5.13 – Follow-up on all other M/R violations (when lead was detected < 5 ppb at 90 th percentile in last round of reduced sampling conducted). Explain how these systems will be identified and tracked.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Ohio EPA addresses M/R SNCs.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio addresses M/R violations for systems on the ETT list.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
<p>6.1 – Adopt all rule changes in a timely manner (within two year extension period).</p> <p>Click here to go back to the table of contents.</p>	<p>Ohio EPA adopted the State 2 DBPR on January 1, 2010, and is implementing the rule.</p>	<p>Respond to questions from our state programs about D/DBP regulations.</p> <p>Train state staff about Stage 2 D/DBPR by offering in-state and/or regional training opportunities. As noted in 5.1, provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012). As of July 2010, a work assignment is being prepared by EPA headquarters for the development of training materials.</p> <p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>R5 will complete Schedule 3 reviews that are due by October 2010. Source: FY09 EOY.</p> <p>► R5 will track primacy submittal/review for all rules, including Stage 2.</p> <p>► R5 will determine whether primacy application is complete, identify rule indicators, and determine tracking required for new rules by state.</p>	<p>Ohio EOY: A draft primacy package was submitted. Still awaiting AG certification to complete primacy application.</p> <p>R5 EOY: Ohio EPA is implementing all D/DBPR activities including only returning to compliance systems monitoring annually or triennially when those systems next monitor during a warm water month per a revision to policy that Ohio EPA advised Region 5 on January 24, 2011, will be made beginning with 2011 monitoring periods.</p> <p>EPA sponsored a simultaneous compliance webinar in September 2011.</p> <p>Stage 2 operational evaluation level (OEL) training for the R5 states will take place on March 27, 2012.</p> <p>Combined Stage 1/Stage 2 DBPR training will be held in April 2012 (date TBD).</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
		► R5 will track early implementation transition activities including violation follow-up.	
<p>6.2 – Notify all CWSs, and NTNCWSs (serving greater than 10,000 people), delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.</p> <p>In broad summary, requirements for regulated water systems include:</p> <ul style="list-style-type: none"> – Identifying 40 CFR Part 141 subpart V monitoring locations to determine compliance with TTHM and HAA5 MCLs by completing an IDSE in accordance with the appropriate schedule. – Determining compliance with TTHM and HAA5 MCLs via subpart V monitoring in accordance with the appropriate schedule. – Continuing to comply with Subpart L requirements. 	<p>Ohio EPA will complete activities for schedule 4 PWSs consistent with the Region 5 primacy extension. Ohio will take over the implementation of Stage 2 January 4, 2010.</p>	<p>Region 5 will handle and close out all enforcement actions that we've initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.</p>	<p>Ohio EOY: All PWSs in Ohio have been notified of their Stage 2 IDSE requirements. Violation notices for failure to submit Stage 2 sample monitoring plans were issued for schedule 1 and 2 surface water systems.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	<p>Yes.</p> <p>Ohio EPA will not commit to utilizing CDS to determine the running annual average for distribution system chlorine residual results. Currently all data is reported in hardcopy quarterly operating reports. In July 2010 laboratories will be submitting some of the information electronically; some of the data will continue to be received in hardcopy. Ohio EPA will not be manually entering data into SDWIS/State to use CDS. Ohio EPA will develop reports to assist staff in reviewing data in SDWIS to assist staff in determining violations.</p>	<p>R5 notes that as long as Ohio EPA enforces failure to collect disinfectant residuals, it is not necessary for the state to commit to calculating the RAA or to ensuring systems submit the RAA when all monthly averages are known to be below the maximum residual disinfectant level. This is not a public health risk. Source: FY10 ARDP.</p>	<p>Ohio EOY: All IDSE violations were entered into SDWIS/State per the Stage 2 D/DBP Rule Data Entry Instruction Manual finalized 2/10/2011.</p> <p>District Offices review Monthly Operating reports and address violations.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.	<p>Region will provide States with new rule (Stage 2) violation codes when established by HQ.</p> <p>Monitor D/DBPR related State follow-up to the findings of the last data and enforcement verification report.</p> <p>The following 2008 program review finding may be resolved with compliance determination and reporting tool training that a national workgroup is preparing (completion date TBD): “Ohio EPA should provide additional compliance determination training to staff on correct implementation of the Stage 1 DBPR...Additional training is needed for PWSs and the district offices overseeing systems subject to the Stage 1 DBPR; numerous systems still do not submit chlorine residual data with TCR samples, and violations are not assigned and reported to SDWIS/Fed by the district offices.” SOURCE: FY10 ARDP; 2008 program review final report, pp. 3, 5-6.</p>	<p>Ohio EOY: All Stage 1 MCL and M/R violations for TTHM and HAA5 are generated and migrated through SDWIS/State. Stage 2 monitoring for systems on IDSE schedule 1 and 2 begins 1/1/2012.</p> <p><i>R5 EOY: What is the status of the 2008 program review recommendation to provide additional compliance determination training to staff on Stage 1 (see the Region 5 activities column)?</i></p> <p><i>Ohio EOY: Reporting of chlorine residuals has improved with the move to eDWR, electronic reporting. With the phase out of paper forms, Ohio conducted numerous Webex training sessions for the water systems on reporting MOR data, which includes chlorine residual data.</i></p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
		<p>► R5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED and track actions taken on violations after Data Entry Instructions are made final.²</p> <p>► R5 to follow-up with Ohio EPA regarding the use of compliance decision support (CDS) for Stage 1 and 2, after July 1, 2010.</p> <p>► R5 conduct Stage 2 enforcement.</p>	<p>R5 EOY: As of October 2011, there were 85 Stage 2 M/R violations reported to SDWIS/Fed.</p> <p>Ohio EPA has been using CDS to determine compliance for the Stage 1 and Stage 2 rules.</p>
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ohio EPA will follow-up on chlorine dioxide MRDLs, if they should occur.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio EPA sends NOV's should a chlorine dioxide MRDL occur.
6.6 – Follow-up on all other MCL/MRDL violations.	Ohio EPA sends NOV's and requires public notice for violations. Tracks the receipt of public notices. PWS with DBP MCLs are part of Ohio's priority systems for compliance assistance and enforcement activities.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent NOV's and required public notice. Tracked public notice receipt. Post MCLs on the advisory page.
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Quarterly Operating Reports are submitted and reviewed.	Region 5 will assist as necessary, or as requested.	Ohio EOY: District offices review quarterly reports.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.8 – Follow-up on all M/R violations.	Ohio EPA sends NOVs and requires public notice for violations. Tracks the receipt of public notices. Send reminder post cards prior to the end of the monitoring period to reduce monitoring violations.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent NOVs and requested PN for M/R violations. Sent reminder post cards. R5 EOY: Ohio EPA is incorporating the SOX revisions that U.S. EPA required, which includes delaying SOXing. Ohio EPA requires systems to monitor in the next year during July – September.
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Revised schedules are sent each month. PWS monitoring schedules are increased and decreased in accordance with the rules.		Ohio EOY: Revised schedules were sent.
6.10 – Follow-up on all other reporting requirement violations.	Ohio EPA has a list serve for laboratories and public water systems and also sends reminder postcards to ensure results are submitted.	Region 5 will assist as necessary, or as requested.	<i>R5 EOY: What is the status of this activity?</i> <i>Ohio EOY: For FFY 2013, Ohio will have a procedure for rescinding violations when data is submitted late. If a PWS submits data late, the M/R violation is rescinded but the letter will reflect that a reporting violation still exists.</i>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
<p>7.1 – Adopt all rule changes in a timely manner (within two year extension period).</p> <p>Click here to go back to the table of contents.</p>	<p>On 2/20/08 Ohio EPA submitted an addendum to its initial primacy application of 9/26/07 agreeing to make corrections during upcoming five-year rule review (by 8/1/10).</p> <p>Addressing changes in 3 rule filing packages. Changes to 3745-81-27 were completed 8/13/08. Changes to 3745-81-23 will be original filed with LT2/Stage 2 on 9/25/09. 3745-81-11 is scheduled to be original filed 1/15/10. Rules should be effective by 8/1/10.</p>	Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.	Ohio EOY: The rules were revised based on R5 comments. We are waiting on the AG certification for those revised rules before we submit a revised final primacy application.
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Ohio EPA will send monitoring schedules to all PWSs for calendar year 2011 in late 2010.		Ohio EOY: Sent monitoring schedules to all PWSs.
7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.	<p>Yes.</p> <p>Ohio uses SDWIS to track compliance and violations.</p>		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for IOCs. Will upgrade to SDWIS 3.1 in late Fall 2011.
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	<p>Yes. Ohio EPA tracks the request to PN and when the PN is received, but does not create violations.</p> <p>MCLs were posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html.</p>	Monitor State IOC related follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: OEPA electronically reported all MCL and M/R violations.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
7.5 – Follow-up on ERP MCL violations and take an appropriate course of action that ensures public health protection.	Ohio EPA prioritizes MCL violations. Arsenic MCLs are a priority for compliance assistance and enforcement activities. Ohio EPA sends NOVs and requires public notice for violations. Tracks the receipt of public notices.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent NOVs and requested PN for MCL violations. Track receipt of PN. Required treatment for systems over MCL and included requirements in enforcement actions.
7.6 – Follow-up on all other MCL violations.	Ohio EPA prioritizes MCL violations. Arsenic MCLs are a priority for compliance assistance and enforcement activities. Ohio EPA sends NOVs and requires public notice for violations. Tracks the receipt of public notices.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent NOVs and requested PN for MCL violations. Track receipt of PN. Continued to require treatment for systems over MCL and included requirements in enforcement actions.
7.7 – Follow-up on CWSs and NTNCWSs that are priorities based on the ERP because of M/R violations.	Ohio EPA sends NOVs and requires public notice for violations. Track the receipt of public notices. M/R SNCs are lower priority. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began use of automated calls. Sent NOVs and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.
7.8 – Follow-up on all other M/R violations.	Ohio EPA sends NOVs and requires public notice for violations. Track the receipt of public notices. Prior to the end of the monitoring period send reminder post cards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began use of automated calls. Sent NOVs and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.1 – Adopt all rule changes in a timely manner (within two year extension period). Click here to go back to the table of contents.	Ohio EPA has adopted the rule.	R5 plans to have completed reviews of the final primacy applications by FY2010 for the following rules: LCRSTR, LCRMR, revised PN/TCR, radionuclides, FBRR/LT1, and APA. Source: FY09 EOY.	R5 EOY: R5 is preparing this rule with two others (APA and LCRMR) for Regional Administrator approval. R5 plans to distribute a gross alpha holding time report by the end of March 2012.
8.2 – State makes decision on grand-fathering system data.	Not applicable.		
8.3 – Notify all CWSs of their regulatory requirements.	Ohio EPA will send monitoring schedules to all PWSs for calendar year 2011 in late 2010.		Ohio EOY: Sent all PWSs monitoring schedules.
8.4 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Yes. Ohio uses SDWIS to track compliance and violations.		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for Rads. Will upgrade to SDWIS 3.1 in late Fall 2012.
8.5 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Yes, Ohio EPA tracks the request to PN and when the PN is received but does not create violations. MCLs were posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html .	Monitor State radionuclide related follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: OEPA electronically reported all M/R violations.
8.6 – Follow-up on ERP MCL violations and take an appropriate course of action that ensures public health protection.	Ohio EPA sends NOV's and requires public notice for violations. Tracks the receipt of public notices. Radionuclide MCLs are a priority for Ohio EPA.	Region 5 will assist as necessary, or as requested.	Ohio EOY: There were no Rad MCLs in Ohio during this reporting period.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.7 – Follow-up on all other MCL violations.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Radionuclides MCLs are a priority for Ohio. Currently, no PWSs are in violation of the MCL.	Region 5 will assist as necessary, or as requested.	Ohio EOY: There were no Rad MCLs in Ohio during this reporting period.
8.8 – Follow-up on CWSs that are priorities based on the ERP because of M/R violations.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. M/R SNCs are lower priority. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls for reminders. Sent NOV and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.
8.9 – Follow-up on all other M/R violations.	Ohio EPA sends NOV and requires public notice for violations. Tracks the receipt of public notices. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls for reminders. Sent NOV and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – SOC's			
9.1 – Notify all CWSs and NTNCWSs of their regulatory requirements. Click here to go back to the table of contents.	Ohio EPA will send monitoring schedules to all PWSs for calendar year 2011 in late 2010.		Ohio EOY: Sent monitoring schedules to all PWSs.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – SOC			
9.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC.	Yes. Ohio uses SDWIS to track compliance and violations.		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for SOC. Will upgrade to SDWIS 3.1 in late Fall 2011.
9.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations. MCLs were posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html .	Monitor State SOC related follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: OEPA electronically reported all M/R violations. We are working to improve determination and generation of PN violations.
9.4 – Follow-up on ERP MCL violations and take an appropriate course of action that ensures public health protection.	Ohio EPA sends NOV and requires public notice for violations. Track the receipt of public notices. SOC MCLs are a priority for Ohio EPA. Currently, no PWSs are in violation of the MCL.	Region 5 will assist as necessary, or as requested.	Ohio EOY: There were no SOC MCLs in SFY 2011.
9.5 – Follow-up on all other MCL violations.	Ohio EPA sends NOV and requires public notice for violations. Track the receipt of public notices. SOC MCLs are a priority for Ohio EPA. Currently, no PWSs are in violation of the MCL.	Region 5 will assist as necessary, or as requested.	Ohio EOY: There were no SOC MCLs in SFY 2011.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – SOC's			
9.6 – Follow-up on CWSs and NTNCWSs that are priorities based on the ERP because of M/R violations.	Ohio EPA sends NOV's and requires public notice for violations. Tracks the receipt of public notices. M/R SNCs are lower priority. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls for reminders. Sent NOV's and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.
9.7 – Follow-up on all other M/R violations.	Ohio EPA sends NOV's and requires public notice for violations. Tracks the receipt of public notices. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls for reminders. Sent NOV's and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.1 – Notify all CWSs and NTNCWSs of their regulatory requirements. Click here to go back to the table of contents.	Ohio EPA will send monitoring schedules to all PWSs for calendar year 2011 in late 2010.		Ohio EOY: Sent monitoring schedules to all PWSs.
10.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.	Yes. Ohio uses SDWIS to track compliance and violations.		Ohio EOY: OEPA is using SDWIS 2.22 to track inventory and violations for VOCs. Will upgrade to SDWIS 3.1 in late Fall 2011.
10.3 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations. Ohio EPA re-schedules systems that have detects to monitor in the appropriate quarter. Ohio EPA sends revised schedules each month, as needed. MCLs were posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html .	Monitor State VOC related follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: OEPA electronically reported all MCL and M/R violations. We are working to improve determination and generation of PN violations.
10.4 – Follow-up on ERP MCL violations and take an appropriate course of action that ensures public health protection.	Ohio EPA sends NOVs and requires public notice for violations. Track the receipt of public notices. VOC MCLs are priorities for Ohio EPA.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio EPA sent NOVs and required PNs for all MCLs.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.5 – Follow-up on all other MCL violations.	Ohio EPA sends NOVs and requires public notice for violations. Track the receipt of public notices. VOC MCLs are priorities for Ohio EPA. Ohio EPA has one VOC MCL on its priority systems list for enforcement action.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Ohio EPA sent NOVs and required PNs for all MCLs.
10.6 – Follow-up on CWSs and NTNCWSs that are priorities based on the ERP because of M/R violations.	Ohio EPA sends NOVs and requires public notice for violations. Tracks the receipt of public notices. M/R SNCs are lower priority. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls to remind PWSs to sample. Sent NOVs and requested PN for monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.
10.7 – Follow-up on all other M/R violations.	Ohio EPA sends NOVs and requires public notice for violations. Tracks the receipt of public notices. Prior to the end of the monitoring period send reminder postcards to PWSs and e-mail notifications to PWSs and laboratories.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Sent reminder post cards and email notifications. Began using automated calls to remind PWSs to sample. Sent NOVs and requested PN for Monitoring violations. Track receipt of PN. Address any outstanding M/R violations in enforcement actions.

Table 1 – Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
11.0 – Organic and Inorganic Chemical Monitoring Waiver Program			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval. Click here to go back to the table of contents.	If changed, Ohio EPA will submit its SOC waiver and asbestos distribution waiver programs for approval.		Ohio EOY: Did not change waiver program.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
12.0 – Sodium			
12.1 – Notify all CWSs of their regulatory requirements. Click here to go back to the table of contents.	No.		<i>R5 EOY: Can you please provide information here about why Ohio is not requiring systems to monitor for this contaminant?</i> <i>Ohio EOY: There is not a federal MCL or requirement to perform sodium monitoring. Ohio would have to adopt rules more stringent than the federal rules to require sampling. Ohio doesn't intend to adopt rules for sodium. Sodium is required for new well approval. Ohio references the federal guidance level of 20 mg/L in letters regarding new well results.</i>
12.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.	No.		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
12.0 – Sodium			
12.3 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	No.		
12.4 – Follow-up on M/R violations.	No.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
<p>13.1 – Notify all public water systems of their public notification requirements.</p> <p>Click here to go back to the table of contents.</p>	<p>Instructions completing the public notice requirements, including a draft public notice, are included in all applicable NOV's.</p> <p>MCLs are posted on the DDAGW website at http://wwwapp.epa.ohio.gov/ddagw/Advisories/advisories.html.</p>	<p>R5 plans to have completed reviews of the final primacy applications by FY2010 for the following rules: LCRSTR, LCRM, revised PN/TCR, radionuclides, FBRR/LT1, and APA. Source: FY09 EOY.</p>	<p>Ohio EOY: Verification forms and example PNs sent with NOV's.</p> <p>R5 EOY: Ohio EPA submitted to R5 a final primacy revision package for TCR/PN revisions on April 20, 2009. R5 submitted remaining comments to Ohio EPA on October 31, 2011.</p>
<p>13.2 – Maintain a data base management system that accurately tracks PN violations.</p>	<p>Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.</p> <p>Ohio EPA will begin to use SDWIS to develop a schedule for submitting public notice for Tier 1 PN violations.</p> <p>In addition, all MCLs (except monthly TCR) are posted on the Division's Advisory Tracker on the internet.</p>		<p>Ohio EOY: Ohio has trained staff and is using SDWIS/State to track and create PN schedules. We have begun issuing violations for Tier 1 PN violations and are continuing to work on providing consistent application of the program across the state.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
13.3 – Electronically report all public notification violations to SDWIS/FED.	<p>Yes, Ohio EPA will begin reporting federal Tier 1 PN violations starting 7/1/09. Ohio EPA does track the request to issue PN and when the PN is received for Tier 2 and 3 violations, but will not report these PN violations.</p> <p>Ohio EPA will begin to use SDWIS to develop a schedule for submitting public notice for Tier 1 PN violations.</p> <p>In addition, all MCLs (except monthly TCR) are posted on the Division's Advisory Tracker on the internet.</p>	<p>Monitor State PN related follow-up to the findings of the last data and enforcement verification report.</p> <p>The 2008 program review identified only two PN violations for the violations reviewed during the review, and PN was requested and received on time in both instances. The 2008 program review recommended that now that Ohio EPA is using SDWIS/State to help track PN, Ohio EPA should report PN violations when systems fail to provide PN. Source: FY10 ARDP, FY09 EOY, 2008 program review.</p>	<p>Ohio EOY: OEPA is using SDWIS/State to report Tier 1 PN violations. However, we have not fully implemented the program.</p> <p>R5 EOY: The FY2011 violations data available from EPA headquarters—for open violations between 7/1/10 and 6/30/11—indicates that Ohio reported 5 PN violations during this time period. The last time SDWIS/Fed was checked in July 2010, there was 1 PN violation that had been reported in 2007.</p>
13.4 – Follow-up on all Tier 1 violations.	Ohio EPA prioritizes acute violations and can issue public notice if the PWS doesn't. In addition, Ohio EPA posts all MCLs (except monthly TCRs) on its Advisory Tracker on the internet. Ohio EPA will start with Tier 1 violation PN compliance as resources allow.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Began issuing violations for Tier 1 PN violations. All Tier 1 violations are posted on the Ohio EPA Advisory page.
13.5 – Follow-up on all Tier 2 violations.	Tier 2 MCLs are a priority for Ohio EPA. Tier 2 public notices are on the Advisory Tracker, except Monthly MCLs. PN violations are addressed in any enforcement action taken.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Request PN and track receipt. All MCLs with the exception of monthly TCR MCLs are posted on the Ohio EPA advisory page. Follow up on PN violations during enforcement actions.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
13.6 – Follow-up on all Tier 3 violations.	Tier 3 violations are a lower priority. PN violations are addressed in any enforcement action taken. Ohio EPA will consider using SDWIS to assist in getting PNs submitted.	Region 5 will assist as necessary, or as requested.	Ohio EOY: Request PN and track receipt. Follow up on PN violations during enforcement actions.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – CCR			
14.1 – Notify all regulated water systems of their CCR requirements. Click here to go back to the table of contents.	Yes.		Ohio EOY: Ohio EPA sent reminder postcards.
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Yes. Ohio uses Compliance Schedules in SDWIS to track CCR compliance.		Ohio EOY: OEPA is using SDWIS to track receipt of CCRs through compliance schedules.
14.3 – Electronically report all CCR violations to SDWIS/FED.	Yes.	Monitor State CCR related follow-up to the findings of the last data and enforcement verification report.	Ohio EOY: CCR major violations are generated in SDWIS and reported to SDWIS/FED.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – CCR			
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	<p>No.</p> <p>Ohio EPA will forward PWSs not issuing a CCR or issued a CCR with insufficient content to R5 for enforcement actions.</p>	Region 5 will assist as necessary, or as requested.	<p>Ohio EOY: DDAGW needs to re-visit referral of CCR violations with the Director.</p> <p>R5 EOY: R5 has not recently received any CCR referrals.</p> <p>Ohio EPA recently centralized the CCR program. NOVS are sent to systems failing to issue a CCR. Further enforcement is not prioritized unless included as part of another enforcement action.</p> <p>Ohio EPA is not conducting content reviews of CCRs.</p>

Table 1. Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – Laboratory Certification			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the <i>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</i>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>Click here to go back to the table of contents.</p>	<p>Ohio EPA has a drinking water laboratory certification program. Certification is required at least every three years.</p>		<p>Ohio EOY: Surveys were done at laboratories and a list of certified labs is maintained.</p> <p>R5 EOY: R5 is working on obtaining documentation of Ohio's agreement with the Wisconsin State Laboratory of Hygiene for radiochemical analyses. We need this documentation for primacy purposes to show that Ohio has the resources to run the program.</p> <p>R5 certified the Wisconsin State Lab of Hygiene in 2011, which Ohio and Michigan are using as their primary laboratory for radiochemicals.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p> <p>R5 information request: Region 5 would appreciate the opportunity to review and possibly offer comments on the revised draft compliance strategy once it is completed at the end of FFY2010. Does Ohio EPA plan to share with R5 a revised draft compliance strategy at the end of FFY2010 (see FY2009 ARDP)?</p> <p>Click here to go back to the table of contents.</p>	<p>Ohio EPA began updating its compliance strategy in 2007. Ohio EPA has a draft of its strategy on its intranet.</p> <p>Ohio EPA will not commit to completing the updating of its compliance strategy, but we will continue the development of standard operating procedures which includes compliance and enforcement activities.</p> <p>Ohio began an intranet version in SFY 2009.</p>	<p>R5 is working closely with Ohio EPA via e-mails and conference calls to assist in effectively and efficiently implementing the GWR. R5 encourages Ohio EPA to continue to refer GWR M/R violations to R5, as well as all other M/R violations that R5 can assist in resolving.</p>	<p>Ohio EOY: Current administration developed a Compliance and Enforcement Strategy. DDAGW is modifying its program to incorporate changes. Will submit to Region 5 for comment in SFY 2012.</p> <p>R5 EOY: Ohio submitted a draft compliance through enforcement strategy to R5 on December 8, 2011. We expect to provide comments to Ohio EPA by April/May 2012.</p> <p>In 2012, R5 will conduct EV audits in two states, as resources allow.</p> <p>R5 continues to look to states to refer noncompliant PWSs.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities.	<p>Ohio EPA will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly SNC letter. Activities to update can include: the compliance status of new SNCs, SNCs about to become Exceptions, Exceptions, enforcement actions the state has or will be taking to address systems that have not returned to compliance, and any inventory and data corrections. The state will also update SDWIS/FED with this information and link SNC-addressing enforcement actions, and/or SOX dates to all violations that made systems SNCs in its next quarterly submission.</p> <p>Ohio EPA continues to use a State SNC list.</p>	Assist with, referrals, analysis, data clean up or other joint efforts as requested by state.	<p>Ohio EOY: For SFY 2011, Ohio EPA used the ETT list to address systems with a score equal to or greater than 11. Moving to addressing systems before reaching a score of 11.</p> <p>R5 EOY: Ohio EPA continued to effectively manage and enforce against priority systems.</p> <p>Ohio's 2011 commitment was to address 152 systems—this is the number of systems on the 2011 fixed based list (generated in July 2010) with ETT scores of 11 or more. The July 2011 frozen data base indicated that 224 systems were addressed, 101 from the original fixed base list). Ohio is commended for this accomplishment. R5 is interested in receiving referrals for the 51 unaddressed systems on the 2011 fixed based list.</p> <p>Small systems initiative—R5 is working with Ohio EPA to identify school and daycare PWSs with certain LCR violations (type 52 and 66), and LCR action level exceedances that R5 could contact to assist with compliance.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
			<p>R5 sent Ohio EPA lists of Ohio schools and daycares with reduced lead and copper M/R violations that remained un-SOX'd in SDWIS/Fed, asked for status updates, and offered assistance.</p> <p>R5 is writing an article for a newsletter about its small system initiative efforts and will be providing periodic updates to Ohio EPA on its activities.</p>
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	Yes.	Assist with, referrals, analysis, data clean up or other joint efforts as requested by state.	<p>Ohio EOY: Ohio EPA provides technical assistance. Addressed systems when ETT score was 11. Used ability to condition a license to operate in addition to traditional enforcement actions such as BCAs and Findings and Orders.</p> <p>R5 EOY: Ohio EPA has the ability to condition a license to operate in addition to traditional enforcement actions.</p>
16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	Yes.	Each quarter, R5 will send the states updated ERP reports requesting a state update. R5 will integrate State updates into reports before the next request is sent out.	<p>Ohio EOY: Ohio EPA and Region 5 work together to clean up the ETT list with the most up-to-date information.</p> <p>R5 EOY: R5 appreciates Ohio EPA's engagement and timely updates on compliance and enforcement activities.</p> <p>R5 maintains a direct enforcement</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
			role in our states and continues to pursue with Ohio EPA how to most effectively coordinate those efforts. In particular, the R5 continues to look to states to refer noncompliant PWS.
<p>16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.</p> <p>Reporting SOX also helps ensure an accurate violation duration. It is particularly important to SOX open-ended violations that, if left “un-SOX’d,” will negatively affect this measure.</p>	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.	<p>U.S. EPA Office of Ground Water and Drinking Water (OGWDW) is taking the lead on a comprehensive list of RTC definitions and plans to share a draft when available. Source: FY09 EOY.</p> <p>► R5 will work with states through the ERP transition and the related 2011 OECA measure tracking.</p>	<p>Ohio EOY: Ohio EPA uses auto SOXing and manual SOXing to close out violations. Ohio EPA reports enforcement actions.</p> <p>R5 EOY: Ohio EPA and R5 have invested in a data exchange, which identifies enforcement priorities and also where data fixes need to occur. Ohio EPA is actively using this mechanism.</p>
16.6 – U.S. EPA has shared with ASDWA and states the revised Enforcement Response Policy (ERP) and Enforcement Targeting Tool (ETT). The revisions to the ERP and ETT will be used for commitments in 2011. ASDWA is coordinating state comments, and R5 is available for any questions.		Region 5 to participate with OECA and the ASDWA/EPA workgroup in better refinement and implementation of the policy and formula.	<p>Ohio EOY: Ohio EPA fully utilizing the ETT list.</p> <p>R5 EOY: R5 and Ohio are using the ERP and ETT to measure progress in meeting compliance and enforcement commitments. Ohio and R5 implement a data exchange to ensure that enforcement resources are targeted at the right</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
			PWSs. This has been effective in identifying PWSs and communicating and prioritizing enforcement.
16.7 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2010 and June 2011.			Ohio EOY: Ohio EPA addressed the systems above 11 on the ETT list.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
<p>17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p> <p>Ohio EPA planned to switch from SDWIS/State 2.22 to SDWIS/State 2.3 the week of April 26, 2010. Ohio EPA is reporting with FedRep 3.2.</p>	<p>For each data submission with errors, the State will contact the Region about their plans for fixing the errors.</p> <p>Ohio will use the latest version of FedRep and correct all object errors and as many data quality errors as possible before the end of the quarter. Ohio will follow agreed upon protocol for transmittal, receipt, and review of output reports.</p>	<p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	<p>Ohio EOY: OEPA will upgrade to SDWIS 3.1 in late Fall 2011 after ESS is upgraded.</p> <p>R5 EOY: Ohio EPA is currently using SDWIS/State 2.22 and has been waiting for the ESS software update prior to moving to SDWIS/State 3.0. The ESS software upgrade became available in November 2011 and Ohio is currently beginning the process to move to SDWIS 3.01. Ohio is planning to have the SDWIS/State 3.01 software up and running by the end of March 2012.</p> <p>This past year, R5 has been expanding their review of SDWIS/Fed data to improve the data quality in SDWIS/Fed. Extra</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
Click here to go back to the table of contents.			review activities include looking for violations that begin after a water system has been deactivated and open-ended violations linked to an RTC enforcement action with a date prior to or on the same day as the begin date of the violations. As of December 31, 2011, Ohio EPA had 379 violations in the ODS with a begin date after the water system's deactivation date. Ohio also had three open-ended violations linked to an RTC enforcement action with a date prior to or on the same day as the begin date of the violation.
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	Ohio EPA will review ownership type and identify schools and daycares.		Ohio EOY: Ohio has started to review the service area types in SDWIS, but it has not been completed.
17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan): 17.3.a – State will utilize to the fullest extent possible electronic technology to improve reporting of water system data including electronic reporting from labs and automated monitoring schedule generation and system notification.	Data management is critical to each state's ability to maintain primacy. As the state's budget allows, the state may send a representative to the ASDWA Data Management User's conference. 17.3.a – Ohio EPA will pursue this activity as resources allow. The state adopted laboratory	Region 5 is continuing to develop compliance determination and violation reporting training and will pilot it with R5 states when a final draft is completed. The final LCR module will be completed in October 2010, and rule modules for all other NPDWRs will be completed by the end of FY2011.	Ohio EOY: 17.3.a – All labs are required to report electronically. 17.3. b and f – Using electronic data for most compliance determinations. Still working to move into facility analyte levels (FANLS) for SWTR, DBPs, and Lead and Copper.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
<p>Ohio EPA should continue with its current efforts to receive all data electronically and continue to encourage the district offices to use SDWIS/State more fully. Source: FY10 ARDP; 2008 program review final report, p. 7.</p> <p>Ohio EPA is moving a rule forward in the summer of 2010 to require electronic reporting for systems and labs. The rule would require systems and labs to electronically report by July 1, 2010. Source: FY10 ARDP.</p> <p>17.3.b – State will utilize automated compliance determination tools to the fullest extent possible.</p> <p>17.3.c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3.d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3.e – Assuming the problems with using the eDV tool are fixed, State to consider utilizing the eDV tool when available to evaluate compliance determinations and identify and correct potential</p>	<p>certification rules in September 2009 requiring labs to electronically report data to the state (effective July 2010).</p> <p>17.3.b – Ohio EPA will pursue this activity as resources allow.</p> <p>17.3.e – As resources allow Ohio EPA may evaluate the eDV tool.</p>		<p>17.3.c – SOPS are drafted for some SDWIS components such as Chem/Rad, TCR, GWR and some of Lead and Copper.</p> <p>R5 EOY: There was one state file review scheduled in FY2011, which was conducted in Illinois. R5 plans to conduct the next file review in Minnesota.</p> <p>17.3.a. – ESS was upgraded to work with SDWIS/State 3.01 on November 7, 2011. Ohio EPA is currently beginning the process to move to SDWIS 3.01.</p> <p>17.3.e – Ohio has expressed interest in learning which states have used the eDV 2.04 module in SDWIS/State, which currently (as of March 2011) is not compatible with SDWIS/State 3.0, and R5 will follow-up with Ohio about this.</p> <p>17.3.f – Ohio EPA is establishing a data base of all non-compliance related information that will be made available to the public during this program year. Ohio EPA will also evaluate making Drinking Water Watch available externally as the infrastructure allows.</p>

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
<p>discrepancies as soon as possible.</p> <p>17.3.f – For States using SDWIS/State, please list those modules the State is not using at all or not fully utilizing and the State’s plans or schedule to use them. This includes the timeline to switch over to the latest version of SDWIS/State.</p>			

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
18.0 – Annual Compliance Report			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report. Click here to go back to the table of contents.	Due Dates: 7/1/11 and 7/1/12 Yes, as directed. Ohio did not receive its annual guidance for the 2010 report. Ohio will complete its ACR in accordance with directives from the Region.		Ohio EOY: USEPA Region 5 completed Ohio EPA's compliance report for the last SFY (2010). R5 EOY: OECA to provide annual ACR guidance. R5 will forward guidance when received. Region 5 will send to Ohio the 2011 standard ACR, and Ohio should use the standard report to create and issue the 2011 ACR.
18.2 – Review and provide input to ACR data verification reports sent by the Region or U.S. EPA Headquarters.	Ohio EPA will review and provide input to ACR data verification reports sent by the region or U.S. EPA headquarters.		Ohio EOY: Ohio EPA used Region 5's ACR for 2010.
19.0 – Variances and Exemptions			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State. Click here to go back to the table of contents.	Variances and exemptions are not allowed in Ohio.	Monitor State V&E related follow-up to the findings of the last data and enforcement verification report.	R5 EOY: Not applicable, because variances and exemptions are not used in Ohio.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA's Strategic Plan and State/U.S. EPA Shared Goals			
20.1 – Gather information to track strategic plan progress. Click here to go back to the table of contents.	Report on status of state's commitments for measures in U.S. EPA's strategic plan.	Compile information and report to HQ. Annually assess each State's progress in attaining the shared	R5 EOY: R5's information for the shared goals for the time period 1/1/10 to 12/31/10 follows: Goal: EOY:

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation		
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals					
		goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.	Milestone 1 Milestone 2 Milestone 3 Milestone 4 Milestone 5 Milestone 6 Milestone 7 Milestone 8 Milestone 9 Milestone 10 Milestone 11 Milestone 12	95.0% 90.0% 95.0% 90.0% 95.0% 90.0% 95.0% 5.0% 10.0% 10.0.% 10.0% 10.0%	98.3% 98.9% 96.7% 97.4% 92.9% 98.7% 92.6% 4.2% 23.8% 7.2% 12.5% 19.2%
			In CY2010, Ohio met the goals for 7 of the 12 milestones—1, 2, 3, 4, 6, 8, and 10—for this reporting period. In 2009, Ohio met 6 out of the 12 shared goals. Ohio has been working to improve performance related to milestone 12 and reduced the percentage of TNCWSs with significant/major monitoring violations from 18 percent in 2009 to 6 percent in 2010.		
			Ohio’s performance on milestone 9 decreased between 2009 and 2010. Milestone 9 refers to the percent of CWSs with significant/major monitoring violations, and Ohio’s percentage changed from about 12 percent in 2009 to about 24 percent in 2010. In 2010, about 74 percent of these were TCR, LCR, and Stage		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals			
			<p>1 violations that occurred at small and very small systems. TCR, LCR, and Stage 1 violations comprised about 84 percent of the total violations.</p> <p>R5 convened a semi-annual conference call with Ohio EPA in December 2011 and plans to schedule similar calls every six months.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Preparing for Security Threats at PWSs			
<p>1.1 – State-specific security work plan activities.</p> <p>Click here to go back to the table of contents.</p>	<p>Report work plan progress semi-annually (semi-annual progress reports are due 30 days following end of each six-month period after the grant award date). The progress reports are due for the counter-terrorism and technical assistance and training grants by the following dates:</p> <p>1. Grant number: WP-00582602; award begin and end dates 7/1/05 to 6/30/13; semi-annual progress reports due July 31 and January 31 each year; final progress report is due September 30, 2013; future reporting periods include the following: (07/01/11 to 12/31/11), (01/01/12 to 06/30/12), (07/01/12 to 12/31/12), (01/01/13 to 06/30/13)</p> <p>2. Grant number: WP-00E76401; award begin and end dates 10/1/09 to 6/30/15; semi-annual progress reports due July 31 and January 31 every year; final progress report is due September 30, 2015; future reporting periods include the following: (01/01/11 to 06/30/11), (07/01/11 to 12/31/11), (01/01/12 to 06/30/12), (07/01/12 to 12/31/12), (01/01/13 to 06/30/13), (07/01/13 to 12/31/13), (01/01/14 to 06/30/14),</p>	<p>Review work plan updates.</p> <p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p> <p>Hold quarterly conference calls with state security contacts.</p>	<p>R5 EOY: Ohio EPA is up-to-date on submitting their progress reports for the three counter-terrorism and technical assistance and training grants, two of which are currently ongoing—WP-00582602 and WP-00E76401. Ohio submitted the final report for grant number WP-00582601 in February 2011.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Preparing for Security Threats at PWSs			
	(07/01/14 to 12/31/14), (01/01/15 to 06/30/15) 3. Grant number: WP-00582601; award begin and end dates 7/1/2002 to 6/30/2010; final progress report is due 9/30/2010		

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant. Due Dates – September 30, 2010 and September 30, 2011 ► Considerable funds remain in the ERG, which ends on September 30, 2011. As of January 2010, data in the Integrated Financial Management System (IFMS) indicate that 28 percent of the ERG funds have been expended. Therefore, a contingency plan should be developed to transfer funds	Revise ERG workplan to reflect progress. Develop a fiscal plan as the ERG approaches the end of the budget period.	Coordinate information and issues on Op Cert Program implementation and annual reports as well as ERG progress. Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed. The ERG funds are to be expended within the existing grant end dates, and to help Region 5 states expend these funds within this timeframe, Region 5 staff will share information about successful state efforts to use ERG funds.	Ohio EOY: Started the development and implementation of web-based multi-media training for Class I operators to be used for continuing education and exam preparation. Continued to provide free web-based training for Class A operators. Developed and delivered classroom courses for small system operators. Partnered with Ohio Rural Water Association to provide training to small system operators in multiple locations across the state. Continue to work to develop an operator internship program and develop a web-based multi-media training for Class II water supply operators. R5 EOY: The 2010 Ohio EPA

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
<p>remaining at the end of the grant to the DWSRF, which requires a 20 percent state match.</p> <p>During the joint assessment meeting on October 6, 2009, Ohio EPA indicated that a revised workplan should allow for expending a significant portion of these funds and that matching any remaining part of the funds will not likely present an issue. R5 is available to work with Ohio EPA on a workplan amendment to more effectively spend the ERG funds. Source: FY09 EOY.</p> <p>Click here to go back to the table of contents.</p>			<p>operator certification program annual report was approved in September 2011. This program continues to comply with all of the requirements of the federal operator certification guidelines.</p> <p>Ohio EPA requested a one-year grant extension for the ERG, which was approved. Considerable funds remain in the ERG, which ends on December 31, 2012. As of January 2012, data in the Integrated Financial Management System (IFMS) indicate that 42 percent of Ohio's ERG funds have been expended—\$2,677,906 remains in available grant funds.</p> <p>As of December 2011, the operator internship program that Ohio EPA intends to use ERG funds to develop with help from the Ohio Department of Job and Family Services had not yet been fully implemented. The grant ends on December 31, 2012, and the state should develop a contingency plan to transfer ERG funds that will not be spent to the DWSRF, which requires a 20 percent state match. The anticipated remaining funds from the ERG should be</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
			transferred to the DWSRF as soon as possible. Ohio EPA should submit the request to transfer funds from the ERG to the SRF no later than one month before the end of the grant period.
2.2 – Certify surface water system operators.	Continue to implement operator certification rules.		Ohio EOY: We continue to implement the operator certification rules.
2.3 – Provide training for community and non-community operators that have never been certified.	Staff continue to direct individuals interested in becoming certified operators to web sites where free training is available. Ongoing with web version of Class A training and Class A exams being offered.		Ohio EOY: We have been working on developing a web-based Class I training program that should be implemented early next year. We continue to direct very small system operators to our online Class A training and to web sites where free training is available.
2.4 – Certify operators at systems with a history of violations.	Continue to enforce operator certification rules. Incorporate requirements for certified operators into enforcement actions. Certified operator requirements are being included in enforcement actions when necessary. Non compliance letters are issued when noncompliance is caused by the certified operator.		Ohio EOY: We have continued to enforce operator certification rules. Requirements for certified operators have been included in enforcement actions when necessary. Noncompliance letters are issued to facilities that do not have appropriately certified operators. We have a 95% compliance rate for facilities having appropriately certified operators.
2.5 – Certify CWS operators that have never been certified before.	Continue to implement operator certification rules.		Ohio EOY: We are continuing to implement the operator

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
			certification rules. We have used ERG funds to give free examinations to 1,531 Class A, Class I and Class II water supply operators.
2.6 – Certify NTNCWS operators that have never been certified before.	Continue to implement operator certification rules.		Ohio EOY: We are continuing to implement the operator certification rules. We have used ERG funds to give free examinations to 1,531 Class A, Class I and Class II water supply operators.

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.</p> <p>Due Date – September 30, 2010 and September 30, 2011.</p> <p>3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.</p> <p>Due Date – October 1, 2011</p> <p>Click here to go back to the table of contents.</p>	Yes.	<p>Region 5 is working with EPA headquarters in planning the 2010 National Capacity Development Workshop, September 14-16 in Dallas, Texas. State participation in this workshop is highly encouraged.</p> <p>Region 5 will send a reminder to the State about the capacity development annual report in August 2010 and August 2011.</p> <p>Region 5 will send a reminder to the State about the report to the governor in August 2011.</p> <p>Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.</p>	<p>Ohio EOY: Ohio EPA completed both reports.</p> <p>R5 EOY: Region 5 sent a reminder to Ohio about the capacity assurance (CA) annual report in August 2011. R5 approved the 2011 annual report on December 8, 2011. Areas of strength are documented in the approval letter and include activities such as implementing a new sanitary survey process that uses capability-related questions; working with Ohio RCAP to identify systems in need of financial and managerial capacity; and in partnership with Ohio Rural Water Association and Ohio RCAP, offering training on a variety of topics, including asset management, budgeting, preventive maintenance, source water protection, water loss prevention, security and emergency preparedness, backflow prevention, funding opportunities, among others.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.1 – Update source water assessments, as resources allow.</p> <p>Assist local community source water protection plan preparation and implementation.</p> <p>Click here to go back to the table of contents.</p>	<p>Report the number of CWSs with source water protection (SWP) plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>Complete source water assessment reports for new public water systems.</p> <p>Provide direct technical assistance to local communities developing source water protection plans.</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination between States and Tribes, and at federal facilities.</p> <p>Maintain a forum for U.S. EPA-State communications through U.S. EPA-State conference calls and participate in an annual meeting.</p>	<p>Ohio EOY: 151 municipal CWSs have endorsed source water protection plans and the 537 (43%) of CWSs are “substantially implementing” protective strategies.</p> <p>Completed 44 source water assessment reports for new systems; revised 75 assessment reports for existing systems that are installing new wells or located in potential karst setting.</p> <p>Staff continue to offer workshops to groups of PWS operators, and meet one-on-one with additional operators to assist them in devising appropriate strategies and documenting the effort in a plan.</p> <p>R5 EOY: Ohio EPA reported SWP substantial implementation information and surpassed the FY11 commitments for the two SWP measures (SP4a and SP4b), as specified in appendix A of this document.</p> <p>R5 and five of the six R5 states participated in a source water assessment and protection (SWAP) managers meeting that WDNR organized in Madison, WI, in September 2011.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
			Ohio EPA is commended for revising previous source water protection (SWP) area delineations; conducting SWP planning workshops for multiple municipalities; conducting analyses, site inspections, and investigations of salt storage facilities; designing and implementing an electronic survey to track local implementation of SWP activities; and reviewing planned routes for new oil and gas pipelines and sharing findings with public water systems with SWP areas within or next to the proposed routes.
4.2 – Actively support National Rural Water Association and Rural Community Assistance Partnership technical assistance efforts.	<p>Provide technical assistance and outreach materials at rural water tech sponsored outreach events.</p> <p>Collaborate with Ohio Rural Water Association (ORWA) staff as necessary on development of local drinking water source protection plans.</p>	Participate in annual forum and provide recommendations for future activities.	Ohio EOY: Central Office staff meet with ORWA staff and Farm Service Agency staff on a quarterly basis, and attended the ORWA annual planning meeting. ORWA staff led eight communities in completing an endorsable protection plan. SWAP staff gave presentations on “Issues in Source Water Protection 2011” at six training sessions for public water system operators, sponsored by ORWA.

Table 2. Other, Non-Primacy Activities

Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.3 – Develop and implement coordinated approaches with other regulatory programs to protect both the quality and quantity of source water. For example, consider ways to integrate state source water protection programs into various existing programs, such as state water conservation, water supply, pollution prevention, and environmental justice initiatives.</p> <p>R5 information request: Can you provide an update on the progress your program has had in reviewing Ohio regulations (see the state commitment column)? Source: FY09 EOY.</p>	<p>Work with Clean Water Act (CWA) entities to ensure adequate assessment of surface waters with a Public Water Supply (PWS) use.</p> <p>Work with CWA entities to prioritize impaired waters with PWS impairments to increase TMDL or other pollution control plan development.</p> <p>Work with CWA entities to identify PWS impaired waters in which TMDL or other pollution control plan implementation is occurring and encourage follow-up monitoring assessment which could document restoration.</p> <p>Work with other media programs to develop and implement tailored approaches that will achieve substantial implementation of source water protection.</p> <p>Assist Ohio EPA Division of Surface Water in assessing surface waters designated as a public water supply beneficial use. Provide assistance on TMDL-related projects as requested.</p>	<p>Facilitate information exchange.</p> <p>Encourage other programs to prioritize permitting and compliance activities in source water areas.</p>	<p>Ohio EOY: Continued to support the CWA program in evaluation of the public water supply beneficial use in preparation for the 2012 Integrated Water Quality Report.</p> <p>Collaborated with Ohio’s Lake Erie Office and the Ohio Water Resources Council’s Balance Growth Program to update source water protection strategies in its State Strategy and Best Local Land Use Guidance.</p> <p>Participated in the Ohio’s State Coordinating Committee on Ground Waters workgroup to develop “Recommendations for Geothermal Heating and Cooling Systems - Guidance for Protecting Ohio’s Water Resources.”</p> <p>R5 EOY: Ohio EPA worked with various other programs and agencies, including the balanced growth program to designate SWP areas as designated priority conservation areas, the Farm Service Agency to identify areas that would most benefit from Conservation Reserve Program (CRP) funding while protecting the privacy of land owners, and the Ohio Department of Natural Resources to ensure new oil and gas well permits are protective of ground water resources.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
	Review State of Ohio environmental regulations and technical guidance to encourage incorporation of protection measures (e.g., setbacks or design standards) for source water protection areas.		

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – DWSRF			
<p>5.1 – Implement all required activities.</p> <p>R5 information requests: R5 requests an update about whether Ohio EPA is planning to pursue sustainable water infrastructure incentives in either the DWSRF project ranking system, or in the DWSRF loan interest rate approach, or in both. Source: FY09 EOY.</p> <p>R5 would be interested in Ohio EPA's outlook for DWSRF loan demand in SPY 2011, and in what outreach efforts Ohio EPA may be planning to increase demand for DWSRF loans going forward. Source: FY09 EOY.</p> <p>Click here to go back to the table of contents.</p>	Implement the program in accordance with the annual management and intended use plan.	<p>Review IUP and set-aside workplans.</p> <p>Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.</p>	<p>R5 EOY: Ohio EPA received \$43,610,000.00 in capitalization grant funding for drinking water infrastructure projects and made \$37,220,949 in total state program year (PY) 2011 binding commitments, about 26 percent of which (\$9,824,003) went to disadvantaged community loans and about 38 percent of which (\$14,193,111) went to small systems.</p> <p>Ohio EPA submitted documentation related to the status of DWSRF small systems technical assistance and WHP set-aside use on September 30, 2011.</p> <p>R5 will conduct a desk review of Ohio EPA's PY 2011 set-aside activities the week of April 30, 2012, when the State and Tribal Programs Branch will be conducting their review in Columbus.</p>

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – DWSRF			
			At the end of PY 2011, the total utilization rate for both set-asides combined (not including the administration set-aside) was about 85 percent. At the end of PY 2009 and 2010, the total utilization rate for both set-asides combined was about 71 percent and 79 percent, respectively.
During the April 2009 set-aside review, Ohio RCAP was preparing a rate setting course based on U.S. EPA's Check Up Program for Small Systems (CUPSS) under the small systems technical assistance set-aside—the purpose of which is to help participants set their own rates and explain their rates to their customers—and was expecting to implement the course during SPY09. However, software issues were affecting Ohio RCAP's ability to use and implement the CUPSS software for this course. Is this still an issue? Source: FY09 EOY.			

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report			
<p>6.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.</p> <p>Click here to go back to the table of contents.</p>	Yes.	<p>Use the logic model to improve our ability to understand, measure, assess, and communicate progress.</p> <p>SPM will work with state program to determine state-specific approach, and schedule.</p> <p>R5 next steps include incorporating those comments into a revised version of the report and updating the report with the most recent SDWIS/Fed data (July 2009) for state review/comment by August 2010.</p> <p><i>Resources</i> – logic model component I1 – After the upcoming state biennium budget is passed, discuss with Ohio EPA any implications for the program. Source: FY10 ARDP. [Note: SFY11 budget to be passed by July 1, 2010.]</p> <p>► <i>Data management</i> – logic model component A10 – R5 to follow-up on district office tracking of non-community systems that are not reporting TCR violations. Source: FY2010 ARDP; April 2009 draft logic model report, p. 10.</p>	R5 EOY: R5 next steps include reviewing the most recent SDWIS/Fed data (CY2006 to CY2010, as of July 2011) and preparing a report by March 2012.

Table 2. Other, Non-Primacy Activities			
Other, Non-Primacy Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – Sustainable Infrastructure			
<p>7.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage sustainable water infrastructure (SWI), including, for example, water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this workplan, including source water protection, DWSRF, capacity development, and all-hazards resilience approaches, etc.</p> <p>Ohio EPA uses the DWSRF small systems technical assistance set-aside to provide asset management training to small systems.</p> <p>Click here to go back to the table of contents.</p>		<p>Region 5 staff participate in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Region 5 staff participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>► R5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	<p>R5 EOY: The capacity development section of this work plan includes sustainable infrastructure activities.</p> <p>Ohio EPA has a contract with Great Lakes RCAP to provide training to local officials on asset management. This next year, RCAP will be developing an on-line interactive training tool on asset management. Ohio EPA will also participate in sustainable infrastructure efforts of the Ohio Water Resources Council.</p>
8.0 – Environmental Justice			
<p>8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.</p> <p>Click here to go back to the table of</p>		<p>R5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns--currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools that are under development--as an interim</p>	<p>R5 EOY: About 26 percent of Ohio's 2011 drinking water assistance fund (DWAF) binding commitments went to disadvantaged community loans.</p>

<u>contents.</u>		screening approach.	
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Attachment A: Linking the Strategic Plan to this Workplan

[Click here to go back to the table of contents.](#)

This continuing program grant is consistent with U.S. EPA’s Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant workplan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2011 National Water Program Guidance:
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures**

NOTE: The information in the table below is based on final FY2011 measures at <http://www.epa.gov/ocfo/npmguidance/> (see Final FY 2011 OW Guidance Appendix A and Final FY 2011 OECA Guidance Attachment A).

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
2.1.1	By FY2011, 91 percent of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. <i>State FY11 target: 82%; EOY: 96.9% NOTE: Ohio had two large systems (Cleveland and Dayton) with new violations.</i>
SP-1.N11	By FY2011, 90 percent of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection. <i>State FY11 target: 91%; EOY: 94.5%</i>
SP-2	By FY2011, community water systems (CWSs) will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months). <i>State FY11 target: 91%; EOY: 98.8%</i>
SP-4a	By FY2011, minimize risk to public health through source water protection for 50 percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). <i>State FY11 target: 41%; EOY: 43.3%</i>
SP-4b	By FY2011, minimize risk to public health through source water protection for 57 percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). <i>State FY11 target: 62%; EOY: 63.4%</i>
SDW-1a	By FY2011, 95 percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules. <i>State FY11 target: 97%; EOY: 96.3%</i>

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-2	In FY2011, 90 percent of the data for violations of health-based standards at public water systems is accurate and complete in SDWIS-FED for all maximum contaminant level and treatment technique rules (excluding the Lead and Copper Rule) [based on three-year rolling data from data verification audits]. This measure is an “indicator” that HQ reports—no state target requested at this time.
SDW-3	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. This is an indicator that HQ reports.
SDW-4	In FY2011, achieve a 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). This is an indicator that HQ reports.
SDW-5	The number of Drinking Water State Revolving Fund projects that have initiated operations (cumulative). <i>State FY11 target:</i>
SDW-11	Percent of DWSRF projects awarded to small PWS serving <500, 501-3,300, and 3,301-10,000 consumers. This is an indicator that HQ reports.
SDW-12	Percent of DWSRF dollars awarded to small PWS serving <500, 501-3,300, 3,301-10,000 consumers. This is an indicator that HQ reports.
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. This is an indicator that HQ reports.
SDW-14	Number and percent of PWS, including new PWS, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). This is an indicator that HQ reports.
SDW-15	Number and percent of small PWS (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. This is an indicator that HQ reports.
SDW-16	Average time for small PWS (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). This is an indicator that HQ reports.
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. This is an indicator that HQ reports.
OECA ACS code	Goal 5: Compliance and Environmental Stewardship Subobjective 5.1.2: Address Environmental Problems from Water Pollution
5.1.2 (SDWA02)	Regions, as the primacy authority (and states and tribes with primacy), should commit to address a specific number of systems between July 2010 and June 2011 (this number should be based on the historical number of “new SNC systems” that were generated during an average year when EPA utilized the former SNC approach). The regions should provide the numbers to be addressed broken down by state and tribe with primacy, and by EPA in non-primacy areas (e.g., Wyoming and Indian country), in the comment field. The specific systems to be addressed will be identified using the prioritized list produced by the ETT, to ensure that the highest-priority systems are addressed first. The new ERP requires that systems with violations are addressed and returned to compliance. <i>State FY10 target: 152 of the 152 systems on the 2011 fixed base list; EOY: 224 (101 from the 2011 fixed based list, and an additional 62 that became greater than or equal to 11</i>

¹ **NEW RULE VIOLATION REPORTING QUERY:** The new rule violation reporting query includes all violations for the new rules ever reported for any system type regardless of activity status, which means that there may be violations reported for currently closed systems. This query cannot be finalized until the final data entry instructions are available for all new rules. The specific rule violation codes included in this query are:

- LCRSTR – 66
- Stage 2 – 32, 35
- LT2 – 32, 33, 37/0800, 41/0800, 42/0800, 45/0800, and 47/0800; the only early implementation violations for LT2 include the type 32 violation
- GWR – 31/0700, 34, 41/0700, 42/0700, 45/0700, 48, 73 (36/0700 was an old code programmed into SDWIS/State)

² **SANITARY SURVEY COMPLETENESS QUERY:** The sanitary survey completeness query includes data for all currently active systems. A national measure tracks sanitary survey completeness at surface CWSs as indicated in attachment A (see SDW-1a). The data from the 2007-2009 query will be final in the July 2010 SDWIS/FED database freeze.

³ **LCR 90th PERCENTILE LEAD ACTION LEVEL SAMPLE DATA COMPLETENESS QUERY:** The final query for the LCR 90th percentile lead action level sample data completeness measure (SDW-3) 2008 to 2010 will be run in April 2011. This query is currently being run differently than the headquarters query for SDW-3 in that the R5 query includes active systems that are serving 3,300 people or more at the beginning of the three-year period being evaluated. The headquarters query includes active systems serving 3,300 people or more at the time the query is run.